

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF MISSISSIPPI
OXFORD DIVISION

ADRIAN HOYLE,

Plaintiff,

vs.

CAUSE NO.: 3:21-cv-171NBB-RP
JURY DEMANDED

CITY OF HERNANDO, SCOTT WORSHAM,
in his official capacity as Chief of Police of the
Hernando Police Department, OFFICER
LYNN BROWN, Individually and in his
official capacity as a Hernando Police Officer,
and OFFICER HUNTER SOLOMON, Individually
and in his official capacity as a Hernando Police Officer

Defendants.

PLAINTIFF, ADRIAN HOYLE'S, MOTION TO LIFT STAY

COMES NOW, Plaintiff, Adrian Hoyle (hereinafter Plaintiff) by and through counsel, and files this his Motion pursuant to Rule 16(b)(3)(B) of the Uniform Local Rules of the United States District Court for the Northern and Southern Districts of Mississippi to lift the stay of discovery and in support of same would state as follows:

1. Plaintiff has filed contemporaneously herewith his Memorandum of Law and Facts in Support of Plaintiff's Motion to Lift Stay pursuant to Rule 16(b)(3)(B) of the Uniform Local Rules of the United States District Court for the Northern and Southern Districts of Mississippi.

2. For good cause, Plaintiff prays that if this Honorable Court cannot rule, based upon the record at hand, that Lynn Brown and Hunter Solomon are not entitled to qualified

immunity, and that Plaintiff's suit against the remaining Defendants should proceed, Plaintiff prays for discovery into the limited areas of qualified immunity and the reckless disregard by the Municipal Defendants.

Respectfully Submitted,

SPARKMAN-ZUMMACH, P.C.

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Certificate of Service

The undersigned certifies that on the 4th day of November, 2021, a copy of the foregoing document was electronically filed with court clerk using the CM/ECF System which sent notification of such filing to all counsel of record.

S/Martin Zummach